

U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA, STEPHEN C. DRIES
CLERK
Plaintiff,

20-CR-001

v.

Case No.

KRIS KIM,

[18 U.S.C. §§ 371, 2315]

Defendant.

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

1. Beginning in at least 2013 and continuing until April 11, 2017, in the State and Eastern District of Wisconsin, and elsewhere,

KRIS KIM

knowingly conspired with at least one other person to transport stolen goods in an amount in excess of \$5,000 across state lines, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2315.

Manner and Means of the Conspiracy

2. As part of the conspiracy, defendant Kris Kim arranged with at least one other person to have the stolen devices mailed to Wisconsin. Subsequent to receiving the stolen property, defendant Kris Kim purchased the stolen devices, and Kris Kim and Steve Han sold the devices to individuals in Illinois.

Overt Acts in Furtherance of the Conspiracy

3. In furtherance of the conspiracy and to effect its objects, one or more co-conspirators did the following:

- a. On or about August 13, 2014, Kris Kim arranged for conspirator Min Young Park to purchase electronic devices, which an undercover law enforcement officer represented to be stolen;
- b. On or about August 13, 2014, conspirator Min Young Park purchased the purportedly stolen electronic devices;

- c. On or about December 12, 2015, conspirator Steve Han had telephone contact with a conspirator in the State of Washington regarding the shipment of stolen electronic devices to Wisconsin and payment for those electronic devices;
- d. On or after December 12, 2015, a conspirator in Washington shipped stolen electronic devices to Kris Kim and Steve Han in Wisconsin;
- e. On or about February 20, 2017, Kris Kim arranged for conspirator Steve Han to purchase electronic devices, which a cooperating source working under law enforcement direction represented to be stolen;
- f. On or about March 8, 2017, Kris Kim purchased electronic devices, which a cooperating source working under law enforcement direction represented to be stolen; and
- g. On or about March 29, 2017, conspirator Min Young Park purchased purportedly stolen electronic devices.

All in violation of Title 18, United States Code, Section 371.

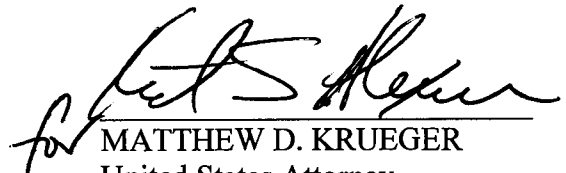
Forfeiture Notice

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 371, set forth in Count One this Information, the defendant Kris Kim shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to:

- a. Approximately \$123,714 in United States currency seized on April 11, 2017, from Kris Kim at 3XXX W. Old Oaks Drive in Greenfield; and
- b. Approximately \$5,500 in United States currency seized on April 11, 2017, from Steve Han at Express Cleaners, 2345 W. Ryan Road in Oak Creek.

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

1/8/2020
Date


MATTHEW D. KRUEGER
United States Attorney